

April 23, 2020

**To All Members of
Webster Heights Homeowners Association**

RE: WEBSTER HEIGHTS HOMEOWNERS ASSOCIATION
- Disclosure of Pending Litigation

Dear Members:

This law firm serves as legal counsel to Webster Heights Homeowners Association ("Association"). The purpose of this correspondence is to inform you of pending litigation involving the Association.

Webster Heights Homeowners Association adv. Kernohan
- Orange County Superior Court Case No.: 30-2020-01129835

On February 5, 2020, Plaintiff Henry Kernohan, owner of a unit within the Association property filed a lawsuit against the Association alleging causes of action for: (1) Breach/Violation of the CC&Rs; (2) Nuisance; and (3) Appointment of a Receiver. One of the bases listed in the complaint for bringing this action is that the Association has a suspended status with the Franchise Tax Board ("FTB"). Please note that the Board addressed this issue with the FTB and had it corrected. The Association is in good standing and any owner may view the Secretary of State website to confirm this information.

The Association's insurance carrier, Philadelphia Insurance, is defending the Association in this action at the carrier's cost and expense. Philadelphia assigned the law firm of Kulik Gottesman Siegel & Ware as defense counsel. Currently, a Case Management Conference is scheduled for May 14, 2020. As the Orange County Superior Court is currently closed due to COVID-19, this date is subject to change. A Trial date has not yet been set.

The Association has been advised that this letter may not, under any circumstances, be quoted or otherwise referred to in any correspondence or documents, or filed or furnished to any governmental agency, without our specific written consent and written approval of the specific language to be included therein, and the name of this firm is not to be referred to in any such statement or document without our prior written consent.

Very truly yours,

BEAUMONT TASHJIAN



TARA RADLEY, ESQ.

TR:sk